

BEFORE THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. 03-63

Investigation by the Department of Telecommunications and Energy to establish a surcharge to recover prudently incurred costs associated with the provision of wireline Enhanced 911 services, relay services for TDD/TTY users, communications equipment distribution for people with disabilities, and amplified handsets at pay telephones.

COMMENTS OF
THE MASSACHUSETTS COMMUNICATIONS SUPERVISORS ASSOCIATION
ON THE INTERIM SURCHARGE FOR 911

I. Introduction

The Department of Telecommunications and Energy seeks comments on the proposed Interim Surcharge for 911. Accordingly, on behalf of many actual operators of Massachusetts 911 Centers (called Public Safety Answering Points or PSAPs), the Massachusetts Communications Supervisors Association herein submits comments on the scope and timing of the proposed surcharge.

The Massachusetts Communications Supervisors Association is a non-profit, voluntary association of PSAP and related emergency services dispatch center supervisors representing approximately 50 Massachusetts municipalities and other governmental entities. Among the principal aims of the Massachusetts Communications Supervisors Association are: (i) promoting the training, equipping, and professional status of call takers and dispatchers; (ii) assisting its membership with the management issues of PSAP operations; and (iii) working in partnership with the SETB and other

organizations, through research and planning, to assist in the ongoing development of the Massachusetts 911 Program.

II. The Interim Surcharge Should Be Implemented Immediately

The Massachusetts Communications Supervisors Association strongly supports the joint proposal by the SETB and Verizon MA to implement the Interim Surcharge beginning no later than September 1, 2003. Currently no funds are being collected to support a fundamental component of public safety in Massachusetts, namely the 911 Program. For many years, prior to 1/1/2003, funds were collected to support the 911 Program from a telephone-related surcharge, but the legislation that supported that funding mechanism ended. New legislation now exists requiring successor telephone-related surcharges to support the 911 Program, but a lengthy administrative process is delaying the start of the collection of funds. The Interim Surcharge is a prudent mechanism to insure that funds begin to be collected while the administrative process to determine the Regular Surcharge is conducted in a thoughtful and professional manner.

III. The SETB Verizon MA Proposal Properly Begins to Meet the Pre-Service Training Needs of Newly Hired 911 Operators

The SETB Verizon MA Proposal allocates funds to the SETB that should substantially support an increase in the skills, knowledge, and abilities of newly hired 911 Operators. Interim Surcharge Funds are being allocated to insure that communities that can afford to send their newly hired 911 Operators to the 5-week Public Safety Dispatch Academy (jointly created by the SETB and the MCSA) will enjoy free tuition (currently a \$550 benefit to municipalities for each dispatcher sent) and improved instruction leading to 7 key certifications and the completion of over 14 job-related skill area modules. These skills are critical, for example, to insure that 911 calls are answered properly, that the correct number and type of emergency responders are dispatched efficiently and quickly, that the safety of responders and citizens is vigorously protected, that lifesaving instructions are able to be given over the phone, that a myriad of complex 911 center

computer and technical systems are able to be operated with a minimum of error, and that 911 operator stress and job turnover is reduced through professional development.

Furthermore, the Academy will be offered in several geographic areas of the state and on a schedule that is convenient and frequent enough (e.g., 5 times each year in two separate locations East and West) to considerably increase the number of newly hired 911 Operators that will likely be able to attend.

In addition to the SETB-coordinated Academy, the MCSA recommends that the SETB develop a program to certify PSAP-sponsored and operated Pre-Service Training Programs (such as those operated by Boston and New Bedford) as meeting Academy standards. In other words, a large city or a regional grouping of PSAPs may be able to conduct a 5-week Academy program on their own, if it meets state standards. Any such program should be supported by surcharge revenues in a manner similar to the SETB Academy.

The MCSA is quite heartened that 911 Surcharge funds are proposed to encourage a much needed standard of 911 Operator training and service. The MCSA pledges to continue its leadership role in the Academy's curriculum design, in the instruction of individual modules, and in recruitment of trainees both from its member PSAPs as well as from PSAPs that have not yet experienced the considerable benefits of Academy skills for their 911 operators. MCSA points out that PSAPs and their municipalities are the employers of most all 911 Operators and thus have a legal and managerial responsibility to insure that the content of Academy instruction meets local PSAP needs and is synchronized and integrated with follow-on on-the-job and on-shift training and supervision offered by each PSAP.

IV. The SETB Verizon MA Proposal Needs to Include Specific Funds Targeted to the In-Service Training and Continuing Education of Current 911 Operators

MCSA recommends that specific funds be included to improve the skills and continue the education of the state's 911 Operators. An MCSA study of PSAP Staffing in January of 2003 (a general term for persons who staff PSAPs and are variously titled as public safety dispatchers, emergency telecommunications dispatchers, police or fire dispatchers, fire alarm operators, or 911 telecommunications) found that the state had 1547 full time non-sworn 911 Operators, 593 part-time non-sworn 911 Operators, 179 Communications Supervisors, 272 sworn police officers or firefighters who always perform 911 Operator functions, and a number of sworn personnel who occasionally perform 911 Operator functions (either as fill-in or on a rotating basis among other patrol or station duties).

Many of these personnel have had little or no in-service training of any kind over a period of many years. The training that is available is typically taken by 911 Operators on their own time for no pay. Very few 911 Operators are able to afford this, thus attendance is minimal. In cases where training is able to be provided by the PSAP employer, it often is restricted to the basic skills of CPR and first aid re-certification.

Examples of skills that must be developed include: the ability to handle suicidal callers, the ability to properly question callers about domestic violence events; the use of Emergency Medical Dispatch cards to give life-saving instructions; the knowledge needed to support fire companies at the scene of a hazmat event using Incident Command techniques; managing a hostage or barricaded suspect situation; coordinating mutual-aid for a mass casualty event; understanding and using communications interoperability; operating 911 TTD devices; using on-call language interpretation services for 911 callers; activating the town Emergency Operations Center; liability of police call taking; managing 911 Operator stress; etc.

The principal reason for the failure of PSAPs to provide in-service training to their 911 Operators is cost. Typically and regrettably, a work shift in any PSAP is staffed at the margin; in other words, all 911 Operators scheduled for a shift are required to be in their seats answering and processing 911 calls (excluding time for meal and rest breaks).

Almost no PSAPs are able to build a training relief factor into their regular work schedule; the few that are able to properly structure staffing to include provision for training, typically find that their intended training relief factor must be used to staff regular shifts owing to personnel turnover or unexpected long-term absences.

Thus, to send a 911 Operator to in-service training requires that another 911 Operator be hired to replace the Operator in training (usually on overtime at 1.5 times the hourly rate of pay). Unfortunately, municipalities cannot afford the cost of overtime relief and simply are not able to free up 911 Operators for in-service training.

Accordingly, MCSA recommends that a stipend support program for In-Service Training of 911 Operators be included as part of the 911 Program and funded out of the Interim and Regular Surcharge. The stipend would fund the direct hourly costs of 911 Operators to attend specific SETB-approved training courses targeted at improving key skills and knowledge. The SETB would establish rules and procedures for stipend payments and would insure oversight of the quality and type of training courses that would be approved.

The costs of such a program are modest in proportion to the yearly budget of the 911 Program as proposed by SETB and Verizon MA. If all of the state's full and part-time non-sworn 911 Operators and line supervisors plus all of the state's full time 911 Operator-assigned sworn police officers and firefighters (a total of 2591 persons in January 2003) availed themselves of 16 hours of training in a year at an average of \$15/hour each, the cost would be \$621,840 for a year.

MCSA recommends that a stipend-funded 911 Operator In-Service Training program be planned and managed by the SETB and phased in over the five year period of the 911 Program. In the first year, FY04, Interim (and Regular to the extent they are finalized) Surcharge funds would be included for planning, course selection and approval, and new program development. These costs are estimated at \$75,000. In FY05 the stipend program would be funded from Interim or Regular Surcharges at the full rate of \$621,840

each year for the four years from FY05 through FY08. These costs would be added to line 7 of the SETB Verizon MA “Massachusetts 9-1-1/Disability Access Fee Projected Costs and Surcharge Exhibit 1” in columns D through G.

V. The SETB Verizon MA Proposal Should Include 911 Call Processing Support Equipment and Materials Vital to Proper Handling of 911 Calls

Since 1996, the Massachusetts 911 Program has placed various equipment and materials in PSAPs. For example, the program has provided 911 telephone answering units (“APU”), instant call playback units, TTY keyboards, audio tape loggers, headsets (for some PSAPs), call detail printers, CAD interface units (for some PSAPs), and some other 911 telephone-related equipment and supplies.

MCSA recommends that this vital equipment be continued to be provided and that the SETB, through its Standards Committee, be able to adjust and augment the type of 911 call processing equipment that is provided based on current needs.

MCSA recommends that the 911 Program Budget include provision for the following: headsets and their interface units sufficient to allow 911 operators to clearly hear callers and speak clearly back to them as well as allow similar headset operations with approved other phones and radio consoles; EMD protocol cards or guides that provide life-saving instructions to 911 callers; 911 Call logger control and playback software and equipment sufficient to allow flexible and rapid access to previous and in-progress 911 call audio; access to foreign language interpretation services so that the needs of non-English-speaking callers can be understood; and access to telephone directory software and listings sufficient to manage the many call-backs and support calls required to support 911 call-processing operations.

MCSA recommends that the costs of these items be included in the Capital Upgrade program costs beginning in FY05. For the purposes of Interim Surcharge calculation, the additional costs of these items are estimated at \$750,000 yearly for a period of four years

beginning in FY05 and would be added to Line 6 of the SETB Verizon MA
“Massachusetts 9-1-1/Disability Access Fee Projected Costs and Surcharge Exhibit 1” in
columns D through G.

Respectfully submitted,

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